

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAENEAN LIGON, et al.,

Plaintiffs,

-against-

CITY OF NEW YORK, et al.,

Defendants.

-----X

**DECLARATION OF
MARK ZUCKERMAN**

12 Civ. 2274 (SAS)(HBP)

MARK ZUCKERMAN, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am a Senior Counsel in the office of the Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above action. As such, I am familiar with the facts stated below and submit this declaration to place the relevant information and documents on the record in opposition to plaintiff's motions *in limine*.

2. Annexed hereto as Exhibit A are the declaration of Roshea Johnson, dated July 12, 2012; excerpts of the July 13, 2012 deposition transcript of Roshea Johnson; and a criminal court certificate of disposition regarding Roshea Johnson's July 11, 2003 conviction;

3. Annexed hereto as Exhibit B are the declaration of Letitia Ledan, dated June 15, 2012; excerpts of the June 18, 2012 deposition transcript of Letitia Ledan; a criminal court certificate of disposition regarding Letitia Ledan's December 10, 2003 conviction; and a criminal court certificate of disposition regarding Letitia Ledan's October 15, 2009 conviction;

4. Annexed hereto as Exhibit C are excerpts of the July 26, 2012 deposition transcript of Antoine Ledan;

5. Annexed hereto as Exhibit D are the declaration of Fernando Moronta, dated July 10, 2012; excerpts of the July 11, 2012 deposition transcript of Fernando Moronta, and a criminal court certificate of disposition regarding his December 6, 2009 conviction.

6. Annexed hereto as Exhibit E are the declaration of Jovan Jefferson, dated August 3, 2012; excerpts of the August 6, 2012 deposition transcript of Jovan Jefferson, and a certificate of disposition regarding his January 29, 2009 conviction;

7. Annexed hereto as Exhibit F are excerpts of the July 10, 2012 deposition transcript of Charles Bradley;

8. Annexed hereto as Exhibit G are excerpts of the July 18, 2012 deposition transcript of Police Officer Miguel Santiago;

9. Annexed hereto as Exhibit H are excerpts of the June 13, 2012 deposition transcript of Abdullah Turner;

10. Annexed hereto as Exhibit I are excerpts of the July 30, 2012 deposition transcript of Anginette Trinidad;

11. Annexed hereto as Exhibit J are excerpts of the August 9, 2012 deposition transcript of P.O. Kieron Ramdeen;

12. Annexed hereto as Exhibit K are excerpts of the August 14, 2012 deposition transcript of P.O. Michael Pomerantz.

Dated: New York, New York
October 5, 2012

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendants
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By: _____/s/

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Heidi Grossman
Joseph Marutollo
Brenda Cooke
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cc: Alexis Karteron, Esq. (By E.C.F.)
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